

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FORMER BL STORES, INC., *et al.*,

Debtors.¹

Chapter 7

Case No. 24-11967 (JKS)

(Jointly Administered)

Hearing Date: January 29, 2026 at 11:00 a.m. (ET)

Objection Deadline: January 9, 2026 at 4:00 p.m. (ET)

**NOTICE OF FINAL FEE APPLICATION
OF COLE SCHOTZ P.C., AS SPECIAL REAL ESTATE
COUNSEL, EFFICIENCY COUNSEL AND DELAWARE COUNSEL
TO THE COMMITTEE, FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE FINAL PERIOD
FROM SEPTEMBER 24, 2024 THROUGH NOVEMBER 10, 2025**

PLEASE TAKE NOTICE that on December 23, 2025, Cole Schotz P.C. filed with the United States Bankruptcy Court for the District of Delaware the *Final Fee Application of Cole Schotz P.C., as Special Real Estate Counsel, Efficiency Counsel and Delaware Counsel to the Committee, for Allowance of Compensation and Reimbursement of Expenses for the Final Period from September 24, 2024 through November 10, 2025* (the “Application”), which seeks approval of professional services rendered to the Committee in the amount of \$2,230,867.00, together with reimbursement of expenses in the amount of \$13,797.36.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, so as to be **received no later than 4:00 p.m. (ET) on January 9, 2026 (the “Objection Deadline”)**: (i) the Debtors, c/o Former BL Stores, Inc., 4900 E. Dublin-Granville Road, Columbus, OH 43081, Attn: Ronald A. Robins (rrobins@biglots.com); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017, Attn: Brian M. Resnick, Adam L. Shpeen, Stephen D. Piraino, and Ethan Stern (notice.biglots@davispolk.com); (iii) Delaware counsel to the Debtors, Morris, Nichols, Arsht &

¹ The Debtors in these chapter 7 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Former BL Stores, Inc. (9097); Former Management Stores of Ohio, LLC (7948); Consolidated Property Holdings, LLC (0984); Former Furniture Stores of Ohio, LLC (7868); Former Savings Stores of California, LLC (5262); Former Stores of Ohio, LLC (6811); Former Tenant Stores of Ohio, LLC (0552); Former Savings Stores of Ohio, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Former eCommerce Stores of Ohio, LLC (9612); and Former Low Cost Stores of Ohio, LLC (3277). The former address of the Debtors’ corporate headquarters was 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Tunnell LLP, 1201 N. Market Street, 16th Floor, Wilmington, DE 19801, Attn: Robert J. Dehney, Sr., Andrew R. Remming, Daniel B. Butz, Tamara K. Mann, and Casey B. Sawyer (biglots.mnat@morrisnichols.com); (iv) counsel to the ABL Agent, Choate Hall, & Stewart, LLP, 2 International Place, Boston, MA 02110, Attn: John Ventola (jventola@choate.com), Jonathan Marshall (jmarshall@choate.com), and Jacob Lang (jslang@choate.com); (v) counsel to the Term Agent, Otterbourg P.C., 230 Park Avenue, New York, NY 10169, Attn: Chad B. Simon (csimon@otterbourg.com), James V. Drew (jdrew@otterbourg.com), and Sarah L. Hautzinger (shautzinger@otterbourg.com); (vi) counsel to the Committee, McDermott Will & Schulte LLP, One Vanderbilt Avenue, New York, NY 10017, Attn: Darren Azman (dazman@mwe.com) and Kristin Going (kgoing@mwe.com); (vii) Delaware counsel to the Committee, Cole Schotz P.C., 500 Delaware Avenue, Suite 600, Wilmington, DE 19801, Attn: Justin R. Alberto (jalberto@coleschotz.com) and Stacy L. Newman (snewman@coleschotz.com); (viii) the U.S. Trustee, Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Casey (linda.casey@usdoj.gov); and (ix) counsel to the Chapter 7 Trustee, Pachulski Stang Ziehl & Jones LLP, 919 N. Market Street, 17th Floor P.O. Box 8705, Wilmington, DE 19899-8705, Attn: Bradford J. Sandler (bsandler@pszjlaw.com), Peter J. Keane (pkeane@pszjlaw.com), and Edward A. Corma (ecorma@pszjlaw.com).

PLEASE TAKE FURTHER NOTICE that a hearing on the Application will be held on **January 29, 2026 at 11:00 a.m. (ET)** before The Honorable J. Kate Stickles, United States Bankruptcy Judge of the United States Bankruptcy Court for the District of Delaware, 5th Floor, Courtroom No. 6, 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

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Dated: December 23, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Stacy L. Newman

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*Counsel to the Official Committee of Unsecured
Creditors*